

**REMARKS**

The Official Action mailed April 5, 2007, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on August 28, 2003; June 23, 2006; and December 6, 2006.

Claims 1-17, 19-23, 25-27 and 29-32 are pending in the present application, of which claims 1, 6, 11, 14, 20 and 26 are independent. The Applicant notes with appreciation the allowance of claims 1-10, 14-17, 19-23, 25, 30 and 31 (Office Action Summary and page 2, Paper No. 20070401). Claims 11 and 26 have been amended to better recite the features of the present invention. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action rejects claims 11-13, 26, 27, 29 and 32 as obvious based on U.S. Patent No. 6,465,268 to Hirakata. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in

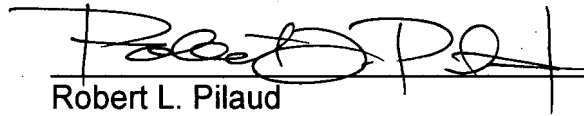
the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 11 and 26 have been amended to recite a pixel thin film transistor, a storage capacitor in a pixel portion, and that an insulating film in contact with a second region has a thinner thickness than a gate insulating film in contact with a first region, which is supported in the present specification, for example, by Figure 5B. The Applicant respectfully submits that Hirakata does not teach or suggest the above-referenced features of the present invention. It is also noted that the Official Action concedes that Hirakata does not teach "a storage capacitor in the pixel portion" (page 2, Paper No. 20070401).

Since Hirakata does not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert L. Pilaud", written over a horizontal line.

Robert L. Pilaud  
Reg. No. 53,470

Robinson Intellectual Property Law Office, P.C.  
PMB 955  
21010 Southbank Street  
Potomac Falls, Virginia 20165  
(571) 434-6789